

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOSEPH ARCHAMBAULT,

Plaintiff

v.

LIBERTY LIFE ASSURANCE COMPANY
OF BOSTON

Defendant

Civil Action No. 05-11762-NG

**JOINT MOTION FOR EXTENSION OF TIME TO FILE
DISPOSITIVE MOTIONS AND SUPPORTING MATERIALS**

Plaintiff Joseph Archambault and Defendant Liberty Life Assurance Company of Boston jointly move that the schedule in this matter be amended to extend the current summary judgment deadlines from July 15, 2006 to and including August 15, 2006, with corresponding oppositions due to be filed on or before August 29, 2006. As grounds for this motion, the parties state as follows.

1. The parties attended status conference with the Court on May 30, 2006. At the status conference the Parties agreed to have this matter referred to the Court's ADR program for mediation. By Order dated May 31, 2006, the matter was referred to the ADR program.

2. By Order dated June 12, 2006, the Court advised the Parties that the matter was scheduled for mediation before Mediator Sally Higginbotham on June 29, 2006.

In light of the proximity of the current dispositive motion deadline to the mediation date, the Parties request that the dispositive motion and opposition deadlines be extended by

one month to enable the Parties to concentrate their efforts and preserve their respective resources for the June 29, 2006 mediation.

WHEREFORE, the parties jointly move that the summary judgment and opposition deadlines be enlarged by one (1) month, to and including August 15, 2006 and August 29, 2006.

Respectfully submitted,

JOSEPH ARCHAMBAULT

LIBERTY LIFE ASSURANCE
COMPANY OF BOSTON

By his Attorney,

By its Attorneys,

/s/ Richard K. Latimer
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CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2006, a copy of the foregoing was served by electronic mail and through the ECF system on Plaintiff's counsel.

/s/ Guy P. Tully
Jackson Lewis LLP